

EXHIBIT 28

Subject: RE: Monthly Outstanding Report-Avalon Holdings Corporation
From: Bryan Saksa <bsaksa@avalonholdings.com>
Date: 7/17/18, 11:40 AM
To: "Whitney, Jennifer x58392" <Jennifer.Whitney@broadridge.com>

Thank you. Yes the Corporate Secretary letter was received.

Bryan P. Saksa
Chief Financial Officer and Treasurer



Avalon Holdings Corporation
One American Way, Warren, OH 44484-5555
Direct (330) 856-8853 Fax (330) 856-8480
bsaksa@avalonholdings.com

From: Whitney, Jennifer x58392 [mailto:Jennifer.Whitney@broadridge.com]
Sent: Tuesday, July 17, 2018 10:37 AM
To: Bryan Saksa
Subject: RE: Monthly Outstanding Report-Avalon Holdings Corporation
Sensitivity: Confidential

Good Morning Bryan,

The NOBO file is scheduled to ship today. Can you confirm you have received the Corporate Secretary letter which provides the password information.

CORPORATE SECRETARY LETTER TRACKING #:1Z89W3920168500593

Regards,

Jennifer

Jennifer A. Whitney | Relationship Manager, BCIS | Broadridge Financial Solutions, Inc.
51 Mercedes Way | Edgewood, NY 11717 | USA | p 631-274-8392 | m 631-275-5063
broadridge.com

From: Bryan Saksa [mailto:bsaksa@avalonholdings.com]
Sent: Tuesday, July 17, 2018 10:29 AM
To: Whitney, Jennifer x58392
Subject: RE: Monthly Outstanding Report-Avalon Holdings Corporation
Sensitivity: Confidential

EXTERNAL EMAIL

Jennifer – do you know the timing of the NOBO listing? Yesterday and today we had almost 1

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million shares traded – almost 1/3 of our total A shares. No current or potential investor has contacted us regarding this activity.

To date, no investor has contacted us or filed a Schedule 13D or 13G for the significant activity that occurred in both May and June.

Thanks

Bryan P. Saksa

Chief Financial Officer and Treasurer



Avalon Holdings Corporation

One American Way, Warren, OH 44484-5555

Direct (330) 856-8853 Fax (330) 856-8480

bsaksa@avalonholdings.com

From: Whitney, Jennifer x58392 [mailto:Jennifer.Whitney@broadridge.com]

Sent: Monday, July 09, 2018 11:11 AM

To: Bryan Saksa

Subject: RE: Monthly Outstanding Report-Avalon Holdings Corporation

Sensitivity: Confidential

Bryan,

Based on the most recent beneficial holder search it appears that the approximate amount of the file would be \$210.00. This does not include the media fees which are listed on the top/middle of the request form.

Regards,

Jennifer

Jennifer A. Whitney | Relationship Manager, BCIS | Broadridge Financial Solutions, Inc.

51 Mercedes Way | Edgewood, NY 11717 | USA | p 631-274-8392 | m 631-275-5063

broadridge.com

From: Bryan Saksa [mailto:bsaksa@avalonholdings.com]

Sent: Monday, July 09, 2018 10:59 AM

To: Whitney, Jennifer x58392

Subject: RE: Monthly Outstanding Report-Avalon Holdings Corporation

Sensitivity: Confidential

EXTERNAL EMAIL

Jennifer – do you have an estimate of what this will cost?

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Bryan Saksa

From: NYSE Complaints and Inquiries <nysecomplaintsandinquiries@theice.com>
Sent: Tuesday, July 24, 2018 3:28 PM
To: bsaksa@avalonholdings.com
Subject: CC03295306 - Contact: Complaints and Inquiries

Intercontinental Exchange®



A support case has been opened. Please use CC03295306 to reference your case.

Reference #: CC03295306

Customer: Bryan Saksa

State: New

Date Opened: 24-Jul-2018 15:27:52 EDT

Case Summary: Contact: Complaints and Inquiries

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Ref:MSGICE95445959

Inquiry regarding Avalon Holdings Corporation's (AWX) Recent Stock Volume

Avalon Holdings Corporation ("Avalon" or the "Company") has 3,191,100 Class A shares issued and outstanding. Based on the Company's knowledge, from the 13D/13 G filings with the SEC (most recent filing was in February 2018), the only investors holding 5% or more of the Class A shares are:

Ron Klinge – 170,417 shares – 5.3% percent of class

Anil Nalluri – 719,234 share – 22.5% percent of class

Dimension Fund Advisors LP – 183,950 shares – 5.8% percent of class

Comprehensive Financial Planning – 459,007 shares – 14.4% percent of class

Backing out these 5% investors Class A shares, there are approximately 1.7 million shares left to trade. Through July 24, 2018, our total trading volume for the year was approximately 5.9 million shares. Based on the number of shares available to trade and the shares traded this year, this does not make sense.

During 2018, there were four days with significant stock activity – May 10th - 630,400 shares traded, June 15th - 836,000 shares traded, July 17th - 990,000 shares traded and July 24th – 1.9 million shares traded. On all four occasions, we have been in contact with the NYSE and stated we were not aware of anything that would cause this significant volume.

No potential investor has contacted us regarding any stock purchase. Based on my conversation with Anil Nalluri (our largest Class A shareholder) on 7/23/18, he has not bought or sold any of his shares.

In addition, there have been no material events regarding the Company that have not been disclosed through a public filing that would cause such activity. No members of management have bought or sold any shares of stock.

The Company would like to know what is/was causing such large trading volume on those days.

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REGULATION

Complaints and Inquiries

NYSE Regulation ("NYSER") welcomes information from investors and others who believe that a member firm or individual broker may have violated securities rules and regulations. That information or related inquiries may be submitted using the link at the bottom of this page. As detailed below and depending on the nature of your complaint or inquiry, the issues raised may be handled by NYSER or fall within the jurisdiction of another regulator.

NYSER has primary responsibility for monitoring activities on the NYSE's equities, options, and bonds markets – i.e., the New York Stock Exchange LLC (equities and bonds), NYSE Arca, Inc. (equities and options), NYSE American LLC (equities and options) and NYSE National, Inc. (equities) (collectively, the "NYSE Exchanges") – and for addressing non-compliance with the NYSE Exchanges' rules and federal securities laws.

On January 4, 2016, NYSER began performing certain surveillance, investigation and enforcement functions that previously had been performed by the Financial Industry Regulatory Authority, Inc. ("FINRA") on NYSER's behalf. FINRA continues to perform a number of regulatory functions for NYSER, including those involving oversight of certain conduct occurring across multiple venues as well as examination, member application, and registration and qualification services.

Below are links to regulators that may have jurisdiction to address complaints and inquiries that fall outside NYSER's purview. Click on a link below if your complaint or inquiry concerns:

- Order execution, insider trading or market manipulation on NYSE, NYSE American, or NYSE Arca by a brokerage firm or representative
- Unfair sales practice or improper business conduct by a brokerage firm or representative industry-wide
- Banks and Savings Institutions
- Insurance Companies
- Transfer Agents

If you have not already contacted the securities firm that your complaint or inquiry concerns, you may wish to do so before contacting NYSER or other regulators. This may give you and the firm an opportunity to resolve the situation without regulatory intervention. If the response from the firm is not satisfactory, you have the option of filing an inquiry or complaint.

If you have a complaint or inquiry regarding a specific order execution, be aware that NYSER cannot investigate your complaint without appropriate background information.

In order to expedite our ability to respond to your concern, your complaint or inquiry to NYSER should provide information that includes, if applicable:

- Your full name, address, telephone number, and e-mail address (unless you choose to remain anonymous)
- The security's name and its ticker symbol
- Names of the securities firm, broker, and other individuals involved
- Date of the trade
- Specific order information, including order type (buy, sell, limit price or market order, etc.) and order size
- Order identification code, branch code, and sequence number (available from your broker at no cost to you)
- A clear, concise summary of the complaint or inquiry

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If applicable, please identify when and by whom the matter may have been previously referred or reviewed. Requests are typically handled in the order in which complete information is received.

If applicable, please identify when and by whom the matter may have been previously referred or reviewed. Requests are typically handled in the order in which complete information is received.

Please be sure to keep copies of any correspondence for your records, along with originals of any documentation.

[Submit an Inquiry](#)

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